

Message

From: David Ferguson [DavidFerguson@microcare.com]
Sent: 5/4/2017 8:14:37 PM
To: Krasnic, Toni [krasnic.toni@epa.gov]
Subject: follow up to your talk on TCE at PMTS in Columbus
Attachments: - nPB and TCE to be reevaluated under TSCA 112916 r.pdf

Good Afternoon Mr. Krasnic;

Thank you for giving the status summary on TCE last week in Columbus. It was informative and helpful as to the current status of TCE, as it progresses thru the EPA's review. I also understand that you dropped by our booth in the exhibition hall. I regret, I was not available at that time, as I did want to speak with you. Hopefully, you had a moment to notice the 2 vapor degreasers we had in the booth. One was running the new Chemours Sion solvent, and the other was running a co-solvent system employing a new chemistry, where the solvating fluid is non-halogenated. Both are environmentally more favorable than historic fluids and offer the market better cleaning fluids with a smaller GWP/toxicity footprint.

MicroCare is a chemical company with a 30 year presence in vapor and vacuum degreasing solvents. Most of the solvent group within MicroCare came from DuPont or Asahi Glass and have a great deal of application and process experience in this field. MicroCare formulates a variety of solvents for vapor degreasing applications, with the majority of them having a fluorinated or Trans-based foundation. In the last two years, we have begun developing new vapor degreasing fluids based on other chemistries to meet cleaning or environmental requirements. Along with selling our own formulations, we are a large reseller of factory formulations from DuPont/Chemours, 3M, etc. This diversity allows us a customer base who use a wide variety of fluids for a broad spectrum of applications. As for customers doing gross metal cleaning, we provide domestically made nPB to select customers with proper (very tight) equipment, but we purposely limit our participation in the nPB market due to the nature of the solvent. As the EPA works thru the regulations on TCE, nPB, PCE, etc., we would be glad to sit down with EPA and share some of our experience with them.

As to the action on TCE, nPB and the 8 other chemicals of concern: We have been communicating the EPA's message to the market to stimulate early action and education, which we believe is the prudent and responsible course (I have attached a copy of one of our letters for your files). However, a few suppliers have been responding to the EPA's action by telling customers that they will have at least 4-5 years before the customer has to be concerned about regulatory activity coming to fruition on TCE.

We encourage the EPA to continue to communicate their development of this program and to include action dates as they have become finalized. If you care to send a notice to myself and other chemical producers when these changes take place, we can help disseminate your message.

I thank you again for giving the presentation, and look forward to future communication with you.

Warmest Regards;

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